

**EXHIBIT 33**

Page 22	Page 23
<p>1 Gotthelf - CONFIDENTIAL</p> <p>2 20 times each.</p> <p>3 A. Perhaps 20 times each?</p> <p>4 Q. In other words who are you</p> <p>5 talking about? Who have you heard him</p> <p>6 curse at?</p> <p>7 A. I think I've overestimated</p> <p>8 because I'm trying to put a number on this,</p> <p>9 and there is no number to be put on it. So</p> <p>10 20 times --</p> <p>11 Q. Well, just tell me who --</p> <p>12 A. If the yell number is 20, maybe</p> <p>13 it's five or so times for each editor on</p> <p>14 the cursing. I'm just trying to be</p> <p>15 accurate.</p> <p>16 Q. No, I appreciate that, but just</p> <p>17 putting aside the number issue, can you</p> <p>18 name any editor you have heard Col Allan</p> <p>19 curse at any number of times?</p> <p>20 A. Yes. Joe Robinowitz, Frank Zini,</p> <p>21 Michael Shain, Chris Shaw, sorry, I'm just</p> <p>22 going through the -- visualizing the</p> <p>23 newsroom. Rich Wilner, that's pretty much</p> <p>24 the people.</p> <p>25 Q. Okay. Tell me how Col Allan</p>	<p>1 Gotthelf - CONFIDENTIAL</p> <p>2 cursed at you. What did Col Allan say to</p> <p>3 you that we're talking about, just to make</p> <p>4 sure we're on the same page?</p> <p>5 A. Well, he may use an expletive if</p> <p>6 we're talking about a news story that the</p> <p>7 Post has missed or as I said before, a fact</p> <p>8 that I didn't inform him on. He may just</p> <p>9 curse, like everyday cursing.</p> <p>10 Q. So give me an example of</p> <p>11 something he has said to you.</p> <p>12 A. Something he has said to me, with</p> <p>13 the expletive in it?</p> <p>14 Q. I'm sorry, say again?</p> <p>15 A. With the expletive in it?</p> <p>16 Q. Yeah, in other words tell me,</p> <p>17 what's the first curse you remember Col</p> <p>18 Allan speaking to you.</p> <p>19 A. Oh, I don't recall. I can give</p> <p>20 you an example.</p> <p>21 Q. Well, let's start with that.</p> <p>22 Give us an example of something he said to</p> <p>23 you.</p> <p>24 A. You should have had that fucking</p> <p>25 story.</p>
Page 24	Page 25
<p>1 Gotthelf - CONFIDENTIAL</p> <p>2 Q. Has he used that phrase with you</p> <p>3 more than once?</p> <p>4 A. A handful.</p> <p>5 Q. Can you remember any other</p> <p>6 examples of specific curses that Col Allan</p> <p>7 has used with you?</p> <p>8 A. I'm sorry, I'm just trying to be</p> <p>9 accurate. Can you state the question</p> <p>10 again?</p> <p>11 Q. Can you think of any other</p> <p>12 examples of cursing that Col Allan has used</p> <p>13 in speaking to you?</p> <p>14 A. He may have used the word, your</p> <p>15 excuse is bullshit, I've heard him say</p> <p>16 that. Nothing offensive, just words that</p> <p>17 come out when you're frustrated.</p> <p>18 Q. When you say nothing offensive,</p> <p>19 would you agree that some people could be</p> <p>20 offended if somebody used the term bullshit</p> <p>21 talking to them in a conversation?</p> <p>22 MR. LERNER: Objection.</p> <p>23 A. I'm not. I can't speak for other</p> <p>24 people.</p> <p>25 Q. Do you believe that talking to</p>	<p>1 Gotthelf - CONFIDENTIAL</p> <p>2 someone using the word bullshit could be</p> <p>3 offensive to a normal person?</p> <p>4 MR. LERNER: Objection.</p> <p>5 A. I can't speak for other people</p> <p>6 other than myself and I'm not offended by</p> <p>7 it.</p> <p>8 Q. Well, you are a journalist,</p> <p>9 right?</p> <p>10 A. Yes, exactly.</p> <p>11 Q. You've spoken to a lot of people</p> <p>12 in your career, right?</p> <p>13 A. I have.</p> <p>14 Q. So when you are out on a beat</p> <p>15 interviewing just a normal Joe on the</p> <p>16 street, would you use the word bullshit</p> <p>17 with that person?</p> <p>18 MR. LERNER: Objection.</p> <p>19 A. I might.</p> <p>20 Q. But you might not?</p> <p>21 A. And I might not.</p> <p>22 Q. Why might you not?</p> <p>23 MR. LERNER: Objection.</p> <p>24 A. Was it warranted.</p> <p>25 Q. And you also said he said to you</p>